

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Commission's)
Rules to Establish New Personal)
Communications Services)

GEN Docket No. 90-314
ET Docket No. 92-100

ORIGINAL
FILE

To: The Commission

COMMENTS
of
HEWLETT-PACKARD COMPANY

Hewlett-Packard Company ("Hewlett-Packard") designs and manufactures a wide range of computer and communications equipment throughout the world, as well as test and measurement, medical and analytical equipment. The scope of these comments is limited to those portions of the Notice in the above-referenced proceeding that deal with the unlicensed User-PCS services.

Hewlett-Packard is a founding member of the Wireless Information Networks Forum ("WINForum") which is submitting comments in this proceeding. Hewlett-Packard generally supports the comments of WINForum, and, in these comments seeks to emphasize certain of the points set forth therein.

Can User-PCS be co-primary with part 94 microwave users?

1. Hewlett-Packard has concluded that the Commission's suggestion that unlicensed User-PCS be co-primary with Part 94 operations is not practically workable. In extensive research and discussions both within

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and outside of the WINForum, no workable mechanism was encountered which would permit the sharing of spectrum between two uses exhibiting such diverse attributes as those of fixed microwave and unlicensed User-PCS. If there is a need for early deployment of User-PCS, provisional authorizations at particular locations could be pursued.

Is 20 MHz adequate for unlicensed User-PCS?

2. We urge the Commission to reconsider its decision to allocate only 20 MHz for User-PCS; a minimum of 40-65 MHz is required if wireless LAN, wireless PBX and cordless telephones are to be accommodated. Moreover, if convenience and economy are to be realized, the frequencies allocated for unlicensed User-PCS must be adjacent to those allocated for licensed services. Only in this way can a single device operate seamlessly in both environments.

We believe, furthermore, that no part of the PCS spectrum need be allocated for backhaul support. All backhaul support should be accomplished through the use of traditional wire, cable, or microwave facilities.

What role should the Commission take in the establishment of unlicensed User-PCS?

3. Hewlett-Packard believes that a group composed of industry members will best establish an etiquette for utilization of the allocated frequencies, and that only an industry group will have the motivation and means to manage and fund the relocation of the incumbents. The Commission should, in Hewlett-Packard's opinion, participate as follows:

The Commission should constitute WINForum as a formal industry advisory committee, and, therefore, attend WINForum meetings and observe the creation of the etiquette by the industry group. Thereafter, the Commission should incorporate the etiquette into its Rules, with enforcement through the FCC equipment authorization process.

The Commission's commitment to enforce the industry-established

etiquette will facilitate the initial funding of the effort to relocate existing microwave users by making it easier for WINForum to arrange for the bonds or other instruments that will be sold to finance that effort.

The Commission should move quickly to adopt rules with regard to the allocation of additional spectrum for unlicensed User-PCS, the relocation of microwave users from those frequencies, and observation of the etiquette. Unless the Commission is prepared and willing to provide such assurance, companies like Hewlett-Packard will be reluctant to make the substantial investments required in invention and production, which will be required for unlicensed User-PCS to succeed.

Respectfully submitted,

Hewlett-Packard Company

A handwritten signature in cursive script, reading "Brice L. Clark", is written over a horizontal line.

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